

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
 ) Case No. 01-1139 (JKF)  
W.R. GRACE & CO., et al., ) (Jointly Administered)  
 )  
Debtors. )

**VERIFIED STATEMENT PURSUANT TO FED. R. BANKR. P. 2019 FILED BY  
PEPPER HAMILTON LLP**

I, David M. Fournier, do hereby declare:

1. I am an attorney at law and a partner in the law firm of Pepper Hamilton LLP (the “Firm” or, “Pepper Hamilton”) located at Hercules Plaza, Suite 5100, 1313 Market Street, Wilmington, Delaware 19801.

2. This Verified Statement is filed in accordance with Rule 2019 of the Federal Rules of Bankruptcy Procedure and in accordance with that certain Revised Order Requiring Filing of Statements Pursuant to Fed. R. Bankr. P. 2019 dated October 22, 2004 (the “FRBP 2019 Order”).

3. As of the date of this Verified Statement, the Firm as been retained as counsel for multiple creditors (each, a “Creditor” and collectively, the “Creditors”) in the above-captioned cases. Pursuant to this Court’s FRBP 2019 Order, this Verified Statement is being filed without exhibits, but such exhibits are being provided in CD format to the Clerk of this Court, counsel for the Debtors and the Office of the United States Trustee. The exhibit consists of a table in electronic format containing the following data: the name and address of the Creditors, the amount of each liquidated claim or indication that the claim is unliquidated, the date of acquisition of the claim (if acquisition occurred within one year prior to the

commencement of these bankruptcy proceedings), and the pertinent facts related to employment of the Firm. However, copies of the respective agreements retaining and employing the Firm will not be included in the exhibits. These agreements contain privileged attorney work product pertaining to advice respecting strategies to be undertaken in these bankruptcy proceedings. These agreements also constitute privileged and confidential attorney – client communications. As such, they are protected from disclosure and will not be disclosed.

4. As of the date of this Verified Statement, the Creditors each hold claims in varying amounts as set forth on the table provided as an exhibit hereto.

5. Upon information and belief, neither the Firm, nor the undersigned attorney, owns or has ever owned any claim against the Debtors in these cases, nor any equity securities of the Debtors.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 16<sup>th</sup> day of October, 2008.

PEPPER HAMILTON LLP

/s/ David M. Fournier  
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